

## South Australian Heritage Council

Submission on Provisional Entry — Neighbour House

DEW Reference Number: 26619 | 61 Braemar Road, Torrens Park SA 5062

### Submitter Details

<b>Name(s)</b>	JA Portmann (Psaltis) & MJS Ragen
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<b>Personal details</b>	We consent to the release of our personal details when this submission is published.
<b>Position</b>	<input checked="" type="checkbox"/> We DO NOT SUPPORT the confirmation of this provisional entry
<b>Oral representation</b>	We wish to appear personally before the Council.

### 1. Introduction and Position

We are the owners of Neighbour House, having purchased the property in May 2022. We write to oppose the confirmation of the provisional entry of Neighbour House in the South Australian Heritage Register as a State Heritage Place.

Our opposition is not to the principle of heritage protection. We acknowledge that Neighbour House has architectural and local historical interest. We also appreciate the quality of Keith Neighbour's career as set out in the Summary of State Heritage Place prepared by Heritage SA.

Our primary ground of opposition is that place does not meet the statutory threshold for State heritage significance under section 16(1) of the Heritage Places Act 1993. The evidence supports local architectural interest, not State-level significance as required by criteria (e) and (g). Being an attractive and well-preserved mid-century house is, as the Council's own 2024 Guidelines acknowledge, insufficient for State listing. On this basis, the provisional entry should not be confirmed. In the alternative, if the Council is not persuaded to remove the listing entirely, we submit that the description of the listed place should be more limited.

We address each ground in turn in the criteria table and submissions below. We also submit that a local heritage listing under the Planning, Development and Infrastructure Act 2016 would provide adequate and proportionate protection for whatever local significance the place possesses.

### 2. Submission on Heritage Significance Criteria

The following table addresses each criterion under section 16(1) of the Heritage Places Act 1993. For criteria not invoked by the Council, we note the position briefly. For criteria (e) and (g) — the Council's grounds — we set out our detailed submissions opposing confirmation.

Criterion	Our Finding	Submission
(a) Important aspects of State history	NOT INVOKED	Not invoked by the Council. We make no submission on this criterion but note that the post-war suburban development context described in the Summary is relevant local history, not State significance.

Criterion	Our Finding	Submission
(b) Rare, uncommon or endangered qualities	NOT INVOKED	Not invoked by the Council. We note that the SA Heritage Register contains approximately 2,347 confirmed State Heritage Places, and that mid-century modernist houses are not categorised as rare or endangered in Heritage SA's published thematic analyses.
(c) May yield information contributing to understanding of State history	NOT INVOKED	Not invoked by the Council. No submission made.
(d) Outstanding representative of a particular class	NOT INVOKED	Not invoked by the Council. We note, however, that the Council's own assessment of the Sisalkraft Factory Complex (DEW 26557, confirmed December 2025) — a Keith Neighbour commercial work — found that building met criteria (d) and (e) but not criterion (g). This is relevant to our submissions on criteria (e) and (g) below.
(e) High degree of creative, aesthetic or technical accomplishment or outstanding representative of particular construction techniques or design characteristics	NOT MET	<p>The Council has found this criterion satisfied based on the house's modernist design, material expression, and its claimed precursory relationship to the Late Twentieth Century Adelaide Regional style. We oppose confirmation on this criterion for the following reasons.</p> <p><b>(i) The 'high degree' threshold requires more than local architectural interest</b></p> <p>The Council's own 2024 Guidelines for Interpreting State Heritage Criteria define 'high degree' (Reference Tool E4) as requiring that the attribute: exceeds what is typical for South Australia; and/or demonstrates excellence beyond the ordinary. Exclusion Guideline XE1 is explicit: 'Being pretty or attractive or popular is in itself insufficient for the purposes of satisfying this criterion.' Exclusion Guideline XE3 provides that the criterion is unlikely to be satisfied where 'available evidence indicates the creative or technical achievements are unlikely to be of a high degree or beyond the ordinary.'</p> <p>Neighbour House is a well-preserved and architecturally coherent mid-century house. It is not, on any reasonable comparative analysis, a work that exceeds what is typical for South Australia. It is one of several comparable houses on Braemar Road alone — including houses by Newell Platten, Andrew McPhee, John Andrews, and Brian Vogt. If many comparable houses exist unlisted, the case for this house as an 'outstanding representative' is materially weakened.</p> <p><b>(ii) The house is derivative of Californian modernism, not a South Australian creative achievement</b></p> <p>The ArchitectureAu article on Neighbour House (Georgina Downey, 2025) describes the house as giving 'an obvious nod to Southern California modernism, and in particular to the initial Bridge House design by Charles and Ray Eames' (Case Study House #8). The house reflects an established international style competently applied to an Adelaide site. A derivative work, however well-executed, does not demonstrate a 'high degree of creative accomplishment' originating in South Australia. Reference Tool E1 asks whether the place represents 'a breakthrough in design' or 'a successful solution to a technical or aesthetic issue extending limits of existing thinking.' This test is not met by a house that follows precedent established elsewhere.</p>

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		<p><b>(iii) The claim that the house prefigures the Adelaide Regional style is architecturally contestable and unsubstantiated</b></p> <p>The Heritage Council's assessment relies substantially on a claimed precursory relationship between Neighbour House and the Late Twentieth Century Adelaide Regional style. However, the key practitioners consistently identified with that style are Robert Dickson, Newell Platten, John Chappel, and JD Craven — not Keith Neighbour. Heritage SA's own assessment for the Graham and Barbara Dickson House, 4 Marola Avenue, Rostrevor (confirmed May 2025) attributes the founding of the Adelaide Regional style to Dickson and Platten specifically. There is no documentary evidence that later Adelaide Regional practitioners cited Neighbour House as a direct influence. The precursor claim is speculative — a post-hoc attribution that reads backward from a later stylistic development. An unsubstantiated speculative claim does not satisfy the evidentiary standard required by the 2024 Guidelines.</p> <p><b>(iv) Comparable interstate decisions support our position</b></p> <p>In the ACT, the Heritage Council refused protection for the Paral House (Derek Wrigley, 1959) based on 'lack of professional recognition for the house' and 'it not being a highlight in Wrigley's architectural career.' These decisions, applying equivalent threshold tests, support our position that local architectural interest does not automatically cross to State significance, and that comparative analysis must be rigorous.</p>
<p><b>(f) Strong cultural or spiritual associations for the community</b></p>	<p><b>NOT INVOKED</b></p>	<p>Not invoked by the Council. No submission made.</p>
<p><b>(g) Special association with the life or work of a person or organisation or an event of historical importance</b></p>	<p><b>NOT MET</b></p>	<p>The Council has found this criterion satisfied based on the house's association with Keith Neighbour AM. We oppose confirmation on this criterion for the following reasons.</p> <p><b>(i) Heritage SA's own assessment of the Sisalkraft Factory found Keith Neighbour did not satisfy criterion (g)</b></p> <p>The most powerful argument against criterion (g) is Heritage SA's own analysis. The formal assessment report for the Former Sisalkraft Factory Complex (DEW 26557, 2025) — a building designed by Keith Neighbour in 1957 — explicitly found the factory 'is not considered to meet criterion (g), at this time, for its association with Keith Neighbour.' The assessors determined that a broader comparative assessment of Neighbour's oeuvre was needed before any single building could satisfy the special association threshold. If Heritage SA itself concluded that a celebrated Keith Neighbour commercial design did not satisfy criterion (g), the provisional entry of his private residence on the same criterion requires compelling additional justification that the Council's assessment has not provided.</p> <p><b>(ii) The 2024 Guidelines favour places where the person carried out the work that made them notable</b></p>

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		<p>Reference Tool G1 of the 2024 Guidelines states: 'In the case of a significant person, the places where the person carried out the work that made them notable would be more likely to be considered to have special associations than the places where they lived or were buried.' Keith Neighbour's acknowledged significance within the SA architectural profession derives from his major commercial and institutional works — the IMFC Building, Adelaide Kindergarten Teachers College (RAIA Award of Merit, 1972), Noarlunga Regional Centre (RAIA Award of Merit, 1977), and his role leading South Australia's largest architectural firm. Significantly, the RAIA SA Chapter named its award for commercial architecture after him — the profession itself memorialised his commercial, not residential, contribution. His private residence is not the place where the work that made him notable was carried out.</p> <p><b>(iii) Keith Neighbour's wartime service does not engage this criterion in relation to Neighbour House</b></p> <p>The Heritage Council's assessment of Neighbour House devotes considerable space to Keith Neighbour's wartime service — his enlistment in the RAAF in 1940, his capture by Imperial Japan, and his 1,248 days as a prisoner of war on the Thai-Burma railway. We do not diminish the gravity of that experience or the personal courage it required. However, his military service is not the reason Neighbour House is nominated for criterion (g), and the house has no special association with that service. Criterion (g) requires a special association with the life or work of a person of historical importance — and the historical importance must be the reason the place is associated with the person. Neighbour House was designed and built between 1956 and 1958, over a decade after his discharge from the armed forces, and its significance under criterion (g) is claimed solely based on his architectural career. His wartime experience may contextualise his life story, but it cannot substitute for an architectural association that meets the statutory threshold. Referencing military service in the assessment of an architectural heritage listing risks conflating personal biography with heritage significance in a way that the 2024 Guidelines do not support.</p> <p><b>(iv) The 'special association' standard requires more than designing and occupying one's own home</b></p> <p>The 2024 Guidelines define 'special' as 'distinct or particular' and 'distinguished from what is considered to be ordinary.' The ordinary case for any architect who designs their own home is that they have an association with it. The criterion requires something beyond the ordinary — a demonstrated connection between this place and the historically important contribution for which the person is recognised. Neighbour's historically important contribution is his commercial practice, not his private residence. The association between this house and the work that made him professionally significant is, on the Guidelines' own reference tools, insufficient.</p> <p><b>(v) Exclusion Guideline XG3 applies</b></p> <p>Exclusion Guideline XG3 states the criterion is unlikely to be satisfied where 'contribution may be limited to local importance' or where 'there is insufficient reliable or verifying information available to demonstrate that the person has</p>

Criterion	Our Finding	Submission
		made a strong, notable or influential contribution towards the course of South Australian history.' Keith Neighbour's significance, while genuine within the architectural profession, is primarily professional and commercial. There is no evidence that his residential design work — as opposed to his institutional practice — shaped the broader course of SA's history.

### 3. Overbreadth of Elements of Significance

Even if the Council does not accept our submissions on the criteria, we submit that the elements of significance as currently defined are vague and ambiguous, extending well beyond the heritage values identified.

#### 3.1 Elements We Accept as Legitimately Significant

Without prejudice to our primary submission, we are prepared to accept that the following elements reflect the architectural heritage values identified in the criteria assessment and are appropriate candidates for protection:

- The house exterior — specifically the exposed Besser block walls, the low-pitched gable roof, the Corbusian-inspired window arrangements, and the steel-cable cross braces at the eastern elevation.
- The compressed straw (Solomit) ceilings, which are an unusual and original material characteristic of the design.
- The overall building form, scale, and siting relative to the sloped terrain.
- The original curved driveway layout as an element of the designed landscape response.

#### 3.2 Elements We Submit Should Be Removed or Redefined

##### Interior layout and spacing

Listing 'interior layout and spacing' as a significant element without further specification would mean that every internal wall, partition, doorway, and room arrangement requires heritage consent to alter. This is an unusually expansive element for a private residence, where spatial needs evolve over time. The heritage significance of the house lies in its external expression of modernist principles, its materials, and its siting — not in the preservation of every internal spatial arrangement. The SA Heritage in Transition Practitioner Guide (2019) requires assessors to specify clearly to what extent a building is listed; blanket coverage of interior layout does not meet this standard.

##### Extant built-in timber furniture

Built-in furniture — including Neighbour's custom housing for audio-visual equipment — has personal and historical interest but is not an element that demonstrates architectural significance at State level. It is a domestic customisation. Including individual items of fixed furniture in the elements of significance expands the listing into the domain of personal furnishing in a manner that is disproportionate to the identified heritage values. If preserved, these items contribute to the character of the house, but their loss would not materially diminish the architectural heritage values that the Council has identified.

##### Original fixtures and fittings (unspecified)

A blanket listing of 'original fixtures and fittings' without specification would, if enforced, require heritage consent to replace door handles, light switches, plumbing fixtures, and similar items

subject to ordinary wear and functional replacement over a 68-year-old residence. Best heritage practice, as articulated in both the Burra Charter and Heritage SA's published guidance, distinguishes between elements of primary significance, contributory significance, and no significance. A blanket listing of 'fixtures and fittings' is inconsistent with this approach and should be replaced with a specific list of any items that individually satisfy the heritage significance test.

#### **Extant original landscaping elements including sloped terrain and creek bed**

The sloped terrain and creek bed are natural geological features of the land, not designed elements. While the house's relationship to the slope is part of its design response, listing the terrain itself goes beyond what is necessary to protect the building's heritage values. This element, as currently defined, may require heritage consent for any earthworks, drainage maintenance, vegetation management, or surface treatment within the property — an unreasonably onerous burden on residential owners. We request that any landscape element be confined to the designed curved driveway layout and the landscape plan elements documented in the 1956 Neighbour plans, and that natural topography be excluded.

### **3.3 Local Heritage Listing as a Proportionate Alternative**

Section 24 of the Heritage Places Act 1993 provides a mechanism for altering the Register where a place should instead be designated as a place of local heritage value. We invite the Council to consider whether, if it is not persuaded by our submissions on the criteria, a local heritage listing under Part 5 of the Planning, Development and Infrastructure Act 2016 would provide proportionate and adequate protection.

Local heritage listing provides demolition protection and requires heritage assessment for development applications that affect significant fabric. Where heritage values are primarily local in their significance, local listing is both legally appropriate and practically more workable for an occupied residential property.

## **4. Conclusion and Requests**

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We do not support the confirmation of the provisional entry of Neighbour House in the South Australian Heritage Register.

Our primary request is that the Council remove the provisional entry from the Register on the basis that Neighbour House does not satisfy criteria (e) or (g) of section 16(1) of the Heritage Places Act 1993 at the State level of significance required by the Act and the Council's 2024 Guidelines.

In the alternative, if the Council confirms the listing, we request that the elements of significance be materially narrowed to those that independently and genuinely demonstrate State-level heritage significance, and in particular that:

- Interior layout and spacing be removed as a listed element or precisely defined to identify the specific spatial relationships that are significant.
- Built-in timber furniture be removed as a listed element.
- Original fixtures and fittings be replaced with a specific list of any items that individually satisfy the heritage significance test.
- Extant original landscaping elements be redefined to exclude natural topography (sloped terrain and creek bed) and be confined to the designed landscape elements documented in the 1956 plans.

We also request that the Council refer the matter to the City of Mitcham for consideration of local heritage listing as an alternative to State listing, pursuant to section 24 of the Heritage Places Act 1993.

We are available to discuss any aspect of this submission with heritage assessment officers and remain available to the Council as required.

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**Declaration**

The information provided in this submission is correct to the best of our knowledge.

Signature: JB AP Date: 14/05/2026

JA Portmann (Psaltis) & MJS Ragen

Please return by 5pm, 18 May 2026 to: DEWHeritage@sa.gov.au | GPO Box 1047, Adelaide SA 5001